

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Prabhjot SINGH

Case No.

Case: 2:22-mj-30134

Assigned To : Unassigned

Assign. Date : 3/16/2022

Description: RE: PRABHJOT SINGH
(EOB)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/15/2022 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Title 21, United States Code,
Section 841 (a) and (b)(1)(A)(ii)

Offense Description

Possession with the Intent to Distribute 5 kilograms or more of Cocaine

This criminal complaint is based on these facts:

Please see attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Brian Manns, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence and/or by
reliable electronic means.Date: 03/16/2022City and state: Detroit, Michigan

Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brian Manns, being duly sworn, depose and state the following:

- 1) I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) in Detroit, Michigan, which is located in the Eastern District of Michigan and have over 30 years of federal law enforcement experience relating to border enforcement activities. During my tenure with the U.S. Customs Service and the Department of Homeland Security, I have conducted numerous investigations relating to money laundering, contraband smuggling, and drug distribution. The following information is based upon my own investigation and previous experiences as well as investigations conducted by fellow law enforcement officers and their previous experiences.
- 2) I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other law enforcement officers and agents; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the

investigation. I have not included details of every aspect of the investigation.

PROBABLE CAUSE:

- 3) In November of 2021, HSI Detroit arrested a Canadian commercial truck driver, hereafter referred to as “Drug Smuggler #1”, following the discovery of approximately 150 kilograms of methamphetamine concealed within his/her commercial trailer. Drug Smuggler #1 has been charged in the Eastern District of Michigan and is currently detained awaiting trial.
- 4) During an investigation of Drug Smuggler #1, agents learned that Drug Smuggler #1 was employed with a Canadian commercial trucking company, hereafter identified as “Trucking Company #1”. Agents are aware that Trucking Company #1 consists of two (2) registered drivers according to the U.S. Department of Transportation website. Additionally, Trucking Company #1 and has been listed as “Out of Service” as of February 6, 2022.
- 5) On March 8, 2022, Prabhjot SINGH, a citizen of India and resident of Canada, entered the United States from Canada in Detroit, Michigan. During this entry, Prabhjot SINGH, hereafter referred to as SINGH, was employed as a commercial truck driver for “Trucking Company #1”. A

review of SINGH's commercial manifest indicated that he was destined to the Los Angeles, California area with a legitimate commercial shipment.

- 6) During the investigation of Drug Smuggler #1, agents identified SINGH to be closely associated with Drug Smuggler #1. Specifically, agents learned that SINGH met with Drug Smuggler #1 in the Detroit, Michigan area, within a day of Drug Smuggler #1 being arrested with the approximately 150 kilograms of methamphetamine in November 2021.
- 7) Based upon subpoenaed camera video relating to the investigation of Drug Smuggler #1, Agents believe that the methamphetamine seized from Drug Smuggler #1 had been brought to Michigan from California by SINGH.
- 8) On March 15, 2022, SINGH was encountered by Michigan State Police (MSP) Troopers/Officers at the Grass Lake Michigan Commercial Truck Inspection area located in Jackson County, Michigan. During this Police encounter, MSP Troopers/Officers initially observed multiple State of Michigan/Department of Transportation violations relating to the commercial truck/trailer being operated by SINGH.
- 9) SINGH was selected for inspection but failed to stop at the request of Troopers/Officers. SINGH was then requested to stop a second time by Troopers/officers and complied. SINGH was then questioned about routine

commercial motor carrier procedures. In response to these questions, SINGH admitted that his truck did not contain a U.S. DOT mandated electronic manifest system log book. According to MSP Troopers/Officers, SINGH started exhibiting signs of extreme nervousness as he was questioned about his commercial truck and the contents of his trailer. SINGH claimed to officers/troopers that he had closed/secured the commercial trailer doors with a seal prior to driving to Michigan from California. An inspection of the rear commercial trailer doors of Officers/Troopers disclosed that the commercial trailer was unsealed.

- 10) Next, MSP Officers/Troopers requested that SINGH open his commercial trailer doors. Immediately within the trailer doors, troopers observed three large duffle style bags located in plain sight at the rear of the trailer. Troopers removed the three large duffle style bags from the rear of SINGH's commercial trailer. These bags were later found to contain multiple brick style packages, which were wrapped in plastic and weighed approximately 142 kilograms. A representative sample of these bricks were later field tested, which provided a positive result for the properties of cocaine. These bricks and packaging were seized by the Michigan State Police.

11) The same day, HSI S/A Manns responded to the MSP Grass Lake, Michigan Commercial Facility and reviewed items seized by the Michigan State Police from SINGH. This review disclosed seized packages to be wrapped in plastic wrapped kilogram sized bricks, with many of bricks containing embossed logos, and hand drawn characters which are consistent with large scale drug smuggling/distribution. S/A Manns is aware based upon experience that 142 kilograms of suspected cocaine has a retail value in excess of \$7,000,000.00 in the Toronto, Canada areas. S/A Manns is aware through prior investigations, that commercial truck drivers, who are actively involved in cocaine smuggling, between the U.S. and Canada are paid \$1,000 per kilogram smuggled as couriering fees. S/A Manns is also aware that commercial truck drivers, who are trusted by their drug smuggling organizations, typically receive under 40 kilograms to smuggle per occasion unless they have completed multiple successful smuggling ventures.

12) On March 15, 2022, SINGH received his Miranda warnings, which he subsequently waived and agreed to speak with agents. This interview was conducted in the English language, and agents verified that SINGH spoke English without difficulty. During the interview, SINGH admitted that he

was acquainted with Drug Smuggler #1, and had met with him/her just prior to Drug Smuggler #1 being arrested in November of 2021 in Michigan. SINGH admitted that he was aware that he was required to perform trucking manifests during his trip to California, but had not as prescribed by U.S. DOT regulations.

- 13) S/A Manns completed computer queries relating to SINGH. These queries disclosed that SINGH has been the sole occupant of the truck containing the suspected cocaine during more than 24 U.S. international border entries in the last 24 months.
- 14) SINGH was subsequently escorted to a local police station and detained by agents pending his initial appearance in federal court.
- 15) S/A Manns is aware that this criminal conduct occurred within the Eastern District of Michigan. Based upon my training and experience, the drug amount seized and the manner in which it was packaged, the 142 kilograms is an amount consistent with distribution.

CONCLUSION

Based on the foregoing, there is probable cause to believe that Prabhjot SINGH violated 21 United States Code, Section 841.

A handwritten signature in blue ink, reading "Brian Manns", written over a horizontal line.

Special Agent Brian Manns
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me
This 16th day of March of 2022

A handwritten signature in blue ink, reading "David R. Grand", written over a horizontal line.

THE HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

March 16, 2022